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UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

NXIVM CORPORATION, formerly known as :
EXECUTIVE SUCCESS PROGRAMS, INC. and FIRST :
PRINCIPLES, INC., : No. 2:06-cv-01051 (DMC/MF) *KSH*
Plaintiffs, : STIPULATION DISMISSING
- against - : COUNTS II AND III OF
ESTATE OF MORRIS SUTTON, ROCHELLE SUTTON, : WITHDRAWING CERTAIN
THE ROSS INSTITUTE, RICK ROSS a/k/a "RICKY" : MOTIONS
ROSS, STEPHANIE FRANCO, PAUL MARTIN, Ph.D., :
and WELLSPRING RETREAT, INC., :
Defendants. :
-----x
RICK ROSS, :
Counterclaim Plaintiff, :
- against - :
KEITH RANIERE, NANCY SALZMAN, :
KRISTIN KEEFFE, JANE DOE :
and JOHN DOES 1-10, :
Counterclaim Defendants. :
-----x
INTERFOR, INC. and JUVAL AVIV, :
Crossclaimants, :
- against - :
NXIVM CORPORATION, KEITH RANIERE, :
NANCY SALZMAN and KRISTIN KEEFFE, :
Crossclaim Defendants. :
-----x

IT IS HEREBY STIPULATED, by and among the undersigned counsel, pursuant to Fed. R. Civ. P. 41(a)(1), that Count II (common law indemnification) and Count III (contribution) of the crossclaim of Interfor, Inc. ("Interfor") and Juval Aviv against NXIVM Corporation ("NXIVM"), Nancy Salzman, Keith Raniere, and Kristin Keeffe are dismissed with prejudice and without costs.

IT IS FURTHER STIPULATED that the motions for summary judgment and partial summary judgment brought by crossclaim defendants NXIVM, Salzman, Raniere, and Keeffe against Interfor and Aviv (Docket Nos. 521, 523, and 524) are hereby withdrawn.

Dated: Newark, New Jersey
January 17, 2014

s/ Robert J. Lack

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SO ORDERED:

KATHARINE S. HANIFIN, CLERK